

1 Lord Jesus Christ
2 Jason Levette Washington
3 [Mail] 5609 Foothill Boulevard
4 Oakland CA 94605

FILED

MAR 16 2020

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

5 UNITED STATES DISTRICT COURT
6 NORTHERN DISTRICT OF CALIFORNIA

7 Jason Levette Washington,

8 Plaintiff,

9 vs.

11 Yassa Goba Washington,

12 Does 1-5,

13 Defendant(s)

CV 20

1882

KAW

)

) CIVIL COMPLAINT

) FOR INJUNCTIVE RELIEF

)

)

)

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18
19 JURISDICTION

20 Pursuant to constitutional jurisdiction provided by US Const. Art. III §2, US Const. Amend. VII
21 and, 42 U.S. Code § 1985(3). Conspiracy to interfere with civil rights, the Plaintiff submits the
22 following civil complaint to the court in pursuit of monetary and injunctive relief from the Court.

23
24 MEMORANDUM OF LAW

25 US Const. Art. III §2

1 The judicial power shall extend to all cases, in law and equity, arising under this
2 Constitution, the laws of the United States, and treaties made, or which shall be made,
3 under their authority;

4 US Const. Amend. VII

5 In Suits at common law, where the value in controversy shall exceed twenty dollars, the
6 right of trial by jury shall be preserved, and no fact tried by a jury, shall be otherwise re-
7 examined in any Court of the United States, than according to the rules of the common
8 law.

9
10 42 U.S. Code § 1985(3)

11 (3) Depriving persons of rights or privileges

12 If two or more persons in any State or Territory conspire or go in disguise on the highway
13 or on the premises of another, for the purpose of depriving, either directly or indirectly,
14 any person or class of persons of the equal protection of the laws, or of equal privileges
15 and immunities under the laws; or for the purpose of preventing or hindering the
16 constituted authorities of any State or Territory from giving or securing to all persons
17 within such State or Territory the equal protection of the laws; or if two or more persons
18 conspire to prevent by force, intimidation, or threat, any citizen who is lawfully entitled
19 to vote, from giving his support or advocacy in a legal manner, toward or in favor of the
20 election of any lawfully qualified person as an elector for President or Vice President, or
21 as a Member of Congress of the United States; or to injure any citizen in person or
22 property on account of such support or advocacy; in any case of conspiracy set forth in
23 this section, if one or more persons engaged therein do, or cause to be done, any act in
24 furtherance of the object of such conspiracy, whereby another is injured in his person or
25 property, or deprived of having and exercising any right or privilege of a citizen of the
26 United States, the party so injured or deprived may have an action for the recovery of

1 damages occasioned by such injury or deprivation, against any one or more of the
2 conspirators.

3
4
5 **VENUE**

6 The PLAINTIFF Jason Levette Washington and DEFENDANT Yassa Goba Washington
7 primary residences are located in Alameda County. Venue is appropriate.

8
9 **PARTIES**

10 PLAINTIFF Jason Levette Washington resides at 5609 Foothill Boulevard, Oakland CA 94605.

11 DEFENDANT Yassa Goba Washington resides at 2220 E21st Street, Oakland CA 94606.

12 DEFENDANT DOES 1-5, are agents that aided and abetted, either directly or indirectly
13 Defendant Yassa Goba Washington's efforts to unlawfully 'evict' the Plaintiff.

14
15 **STATEMENT OF FACTS**
16

- 17 1. The Defendant Yassa Goba Washington did actively conspire with other parties against
18 the Plaintiff Jason Levette Washington for several months and did interfere and obstruct
19 Religious Expression and facilitation of services at his church of attendance and
20 residence for past 6 years located at 5609 Foothill Blvd in Oakland. Defendants later on
21 February 29, March 1 and March 8, eviction attempts which were unlawful premia fascia
22 for their lack of legal authority being neither principal renters nor owners of the premises.
- 23 2. On Sunday, February 23rd, 29th and March 1, 2020, Yassa Goba Washington and her
24 agents did attempt to unlawfully evict resident Jason Levette Washington from his
25 residence at 5609 Foothill Boulevard in Oakland CA 94605 by means violative of Cal.
26 Civ. Code §789.3(a),(b)1.,(b)3 and rights protected 42 U.S. Code § 1985.
3. Plaintiff possesses 2 California IDs, one expired and another current to attest to his
residency.

- 1 4. Plaintiff of each of the three occasions raised requested an Unlawful Detainer according
2 to California law and was refused.
3 5. Below are details of the Defendant Yassa Goba Washington removing Plaintiffs property
4 from the building and locking it outside to dispossess and the incident report from OPD
5 that Plaintiff filed the next day in response to these actions:

6 [Google Drive Audio February 23:

7 https://drive.google.com/open?id=1QFPaXH92ZY6raG_jxQlm2XLYbeBKXhgZ]

8 [Youtube Link February 29: <https://youtu.be/pqTBSsVQBcg>]

9 [Youtube Link March 1: <https://youtu.be/wDMgK05QO-4>]

10 [Google Drive Picture March 2:

11 <https://drive.google.com/open?id=14NaYi4VuOMLX0kN2vBUI2zByfCQ1IiSS>]

12 [Renderos Aids Property Dispossession 3/8/2020

13 [https://drive.google.com/file/d/169vO2Iuok6k75xGTL1xpg7Rti0rIBh_3/view?usp=shari](https://drive.google.com/file/d/169vO2Iuok6k75xGTL1xpg7Rti0rIBh_3/view?usp=sharing)
14 [ng](https://drive.google.com/file/d/169vO2Iuok6k75xGTL1xpg7Rti0rIBh_3/view?usp=sharing)]

- 15 6. The Plaintiff is an active participant of New Beginning International Ministry located at
16 the address in question and is the primary facilitator of all its services Monday –Saturday
17 through the direction of the Founding Pastor Clinton Bobray, and yields to the auspices
18 of the acting Pastor Teman Mansfield on Sundays.

- 19 7. 5609 Foothill Blvd is a dual-use property that has a medium sized hall on one side and
20 an apartment/residence on the other. The premises has been sublet to residence for
21 several years, many of which whose mail is still delivered there.

- 22 8. Plaintiff has had residence at 5609 Foothill Blvd. since **April of 2014** to which both his
23 expired and current drivers licenses shall attest.
24
25
26

- 1 9. Plaintiffs residency was initiated *at will* at 5609 Foothill Blvd by the Lead and Founding
2 Pastor Clinton Bobray in 2014, by whom the primary Defendant Yassa Goba Washington
3 was recently divorced roughly 2 years ago.
- 4 10. Due to Plaintiffs proximity to the hall he has been the primary facilitator and conductor
5 of weekly activities at the Church since the Founding Pastors' need to relocate for
6 personal business 3 year ago. Tuesdays Bible Study, and Friday Prayer service at the
7 church as well as weekly outreach to community has been done exclusively by the
8 Plaintiff, he has become the principal facilitator of 90% of all service conducted at New
9 Beginning International Ministry with the exception of Sunday Service.
- 10 11. Yassa Goba Washington has repeatedly attempted to diminish the presence of NEW
11 BEGINNING INTERNATIONAL MINISTRY in favor of accommodating a Spanish
12 speaking ministry desire rent time already assigned to NBIM ministerial service.
- 13
- 14 12. The Plaintiff Jason Levette Washington's faithful facilitation of NBIM services for last 6
15 years interferes with the Defendants intent to rent NBIM space and time to an outside
16 ministry.
- 17
- 18 13. Defendant Yassa Goba Washington is not the Pastor of NBIM and does not participate in
19 any weekly or outreach activities accept occasional Sunday services.
- 20
- 21 14. The Defendant Yassa Goba Washington neither her agents are owner, resident or
22 authorized renter of the premises in question.
- 23
- 24 15. Yassa Goba Washington is the ex-wife of the founding pastor and has a substantial
25 financial interest in diminishing the presence of NBIM while attempting to retain
26 authority over the property under her ex-husbands name which she does not have by law
nor by will of the founding pastor of NBIM.

1 16. Plaintiff repeatedly asked for an Unlawful Detainer according to California law in order
2 proceed with the due process requirements of California law for an eviction.

3 17. On February 29 and March 1, 2020 Defendant Yassa Goba Washington refused to give
4 credence to California law to provide an Unlawful Detainer at Plaintiffs requests and
5 began removing Plaintiff Jason Levette Washington property outside.

6
7 18. Defendant Yassa Goba Washington would later claim that her request for Plaintiff to
8 leave property, which she possesses no authority to do, was predicated on his "attitude"
9 and failure to "take out garbages", causes that were never mentioned previously in
10 meeting accusing the Plaintiff, never raised when the Founding Pastor was present and
11 which he was never obligated to perform as Plaintiff expressed the meeting when these
12 accusations were initially raised on February 23, 2020 [Link:
https://drive.google.com/open?id=1QFPaXH92ZY6raG_ixQlm2XLYbeBKXhgZ]

13
14 19. Plaintiff has abundant evidence to prove that the harassment and accusation suffered by
15 him; beginning since summer of 2017 by the Defendant and accompanying parties Does
16 1-5 (in the absence of the Founding Pastor, to frustrate and interfere with facilitation of
17 the youth ministry, weekly services and community outreach at the church) were merely
18 attempted means to justify her overall desire to remove the Plaintiff outright from the
19 premises in the absence of the Founding Pastor, which she attempted to execute on the
20 23rd.

21 20. Yassa Goba Washington and agents have been documented for several months
22 attempting to maliciously raise accusations, provoke altercation, and unjustly accuse
23 against the Plaintiff to unjustly substantiate means that were attempted on Feb. 23, 2020.

24 21. Yassa Goba Washington called the Plaintiff on February 12, 2020 around 10 a.m. and
25 attempted to berate him about the sanctuary being setup for youth services that afternoon,
26 when the Defendant began to verbally assault the plaintiff within the hearing range of his

1 colleague, Jennifer Garcia, whom he was in company with at the time, he discontinued
2 the call.

3 22. Yassa Goba Washington attempted to label the Plaintiffs unwillingness to be verbally
4 berated and disconnecting the call as 'disrespect' and justification for her unlawful
5 attempts to remove the Plaintiff from premises and fulfill the purposes of herself and
6 other entities desiring to diminish and replace the Ministry.

7
8 23. Upon March 1, 2020 Plaintiff Jason Levette Washington entered the hall where church is
9 held to participate in services as he had for the last 6 years, that were to start in 15
10 minutes.

11
12 24. When the Plaintiff entered, he found find Defendant Yassa Goba Washington and another
13 person already inside the church

14
15 25. Defendant Yassa Goba Washington said good morning and cordially asked for the key to
16 the back gate, and the Plaintiff not anticipating that she would begin an altercation on
17 Sunday morning before worship service obliged her.

18
19 26. Yassa Goba Washington went into the downstairs near rear of property and began
20 removing the Plaintiffs property that is used for Team Lord Jesus Christ Youth
21 Ministries and ADAM EDEN GOD Landscaping fundraising through the week, placing
22 them outside.

23 27. Defendant Yassa Goba Washington then locked the gate to outside.

24
25 28. When the Plaintiff requested that she return the key that he gave her so that he could have
26 access to property she repeatedly refused she refused.

1
2 29. Plaintiff went into sanctuary waited for the Pastor to begins service and participated.

3
4 30. After services were concluded and the church hall was empty, the Plaintiff called and
5 requested police to come and take a report of the incident to which they responded the
6 following morning.

7
8 31. The downstairs room was not utilized at all that Sunday day for any activity as it had not
9 been for several weeks prior with one exception.

10
11 32. That Sunday March 1,2020 Defendant Yassa Goba Washington did willful interference
12 with the property of the Plaintiff without his consent when willfully dispossessing and
13 locking from Plaintiffs access (1) Unassembled Basketball Backboard for Team Lord
14 Jesus Christ Youth Ministries (2) Garden Cart Full of battery powered and manual
15 landscaping tools used for ADAM EDEN GOD LANDSCAPING (3)Skateboards
16 Utilized for Transportation of participants in Team Jesus and AEG LANDSCAPING
17 assignments. (4 and 5) Two push Reel Mowers for AEGL (6) Extendable Poles for
Basketball Court (7) Amazon Box of accessories used for weekly gospel activities.

18 33. On March 8, Santiago Renderos and other affiliated parties intentionally locked property
19 of the Plaintiff in the backyard and refused to unlock when asked, stating they were
20 instructed by the Defendant Yassa Goba Washington to do so, which directly impacted
21 religious programs services and activities at the church for the week.

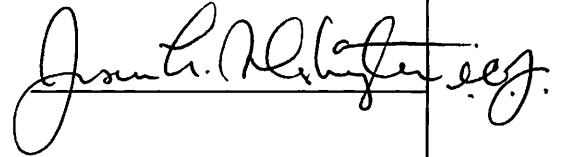
22
23 **CLAIMS**

24 1. Plaintiff raises claim for 42 U.S. Code § 1985 for facts in Paragraphs 1, 2, and 33.

25
26 **RELIEF**

The Plaintiff in this matter petitions the Court for injunctive relief.

Dated this 9th day of March,
Year of my Lord 2020.

A handwritten signature in black ink, appearing to read "Jonathan M. Blum" followed by a flourish.

Court of Appeals for the Ninth Circuit

95 7th St, San Francisco, CA 94103

Civil Rights Division of the U.S. Department of Justice

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